

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Implement the
Commission; Procurement Incentive Framework and to
Examine the Integration of Greenhouse Gas Emissions
Standard into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

and

CEC Docket 07-OIIP-01

**COMMENTS OF
WILD GOOSE STORAGE, LLC
ON TYPE AND POINT OF REGULATION ISSUES**

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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and to
Examine the Integration of Greenhouse Gas Emissions
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**COMMENTS OF
WILD GOOSE STORAGE, LLC
ON TYPE AND POINT OF REGULATION ISSUES**

In accord with the November 28, 2007 Administrative Law Judges' Ruling in the above captioned proceeding ("November 28 Ruling") as modified by the December 10, 2007 Ruling Extending Deadline for Comments, Wild Goose Storage, LLC ("Wild Goose"), hereby submits these comments on issues related to the type and point of regulation of greenhouse gas ("GHG") emissions for the natural gas sector. In lieu of responding to each of the twenty-two questions delineated in the November 28 Ruling, Wild Goose will group its comments around certain subject matters addressed in specific questions.

**I. PRINCIPLES / OBJECTIVES FOR EVALUATING DESIGN OPTIONS
(Questions 3, 11 and 12))**

Through question 3, the November 28 Ruling requests that parties comment on a series of potential principles or objectives to be used by the California Public Utilities Commission ("CPUC") and the California Energy Commission ("CEC") to determine the appropriate method for regulating GHG emissions in the natural gas sector. While each of the principles/objectives should be given consideration in determining the ultimate approach for regulation of GHG emissions, Wild Goose submits that with the respect to such regulation of the natural gas sector, the primary objective should be "environmental integrity." To this end, Wild Goose would

emphasize a well known fact – GHG emissions are not a California problem, they are a global problem. Any regulatory program which serves to reduce the amount of natural gas available to the industrial or commercial sector for use in their respective enterprises will result in leakage. If, for example, a manufacturer cannot produce the necessary amount of product to make a profit due to either (1) a cap on the level of natural gas it can burn, or (2) inability to get sufficient gas due to caps being placed on the state’s natural gas infrastructure, production of that item or commodity in California will be reduced to the level accommodated by the available gas, and the remaining demand for that item or commodity will be produced elsewhere. The result is a mere transport of the problem from one area to another. Moreover, since California is one of the lowest emitters per capita of GHG, it is likely that global GHG emissions will increase as a result of such a shift (i.e., in replacing production, other jurisdictions will encounter a potentially larger per unit emission total than production in California). In such a situation, having lower concentration of GHG in California will not benefit Californians or anyone else.¹

In this regard (as posed in questions 11 through 13 of the November 28 Ruling), Wild Goose believes that it is imperative that consideration be given to actions that other jurisdictions are and/or may be taking regarding the regulation of GHG emissions in the natural gas sector. Regional coordination of the types and timing of regulation will help in the control of leakage and thus will serve the ultimate goal of GHG emission reductions.

II. BASIC DESIGN QUESTIONS: SCOPE OF GHG REGULATION (Questions 4-6)

In considering the scope of GHG regulation for the natural gas sector as articulated in

¹ In the context of natural gas, the impact of leakage is often more than one to one displacement. In other words, if high energy efficiency production using natural gas is curtailed in California and the production is transported to, e.g., Utah, where coal is utilized, every one unit of GHG reduction in California will result in multiple units of GHG creation elsewhere.

Questions 4 through 6 of the November 28 Ruling, the CPUC should keep in mind that natural gas is, in essence, part of the solution to the GHG emissions problem. Natural gas is less carbon intensive than other fuels which can be used as a replacement such as gasoline (gasoline produces 71 Kg CO₂ per MMBtu while natural gas produces 53)² or fuel oil or diesel. If the determined scope of the GHG regulation of the natural gas sector is such that it limits the availability of natural gas, then the antithetical result will be the encouragement of fuel switching (thereby increasing the level of GHG emissions) or, as discussed above, leakage to other states, or other countries. In either case, intended reduction of GHG emissions may not be achieved and in fact may result in increases of GHG. Accordingly, Wild Goose recommends that natural gas infrastructure (transmission, distribution and storage) should be exempt from any cap which is placed on GHG emissions in the natural gas sector.³

Assuring a plentiful supply of natural gas may still result in emission reductions. First, as mentioned above it will preclude switching to more carbon intensive fuels. Moreover, it will ensure the availability of natural gas for switching transportation fuel from gasoline or diesel to compressed natural gas as wells as displacing coal and oil burning with lower GHG natural gas.

If the Commission determines, however, that it is precluded under AB 32 from exempting natural gas infrastructure from GHG regulation, then any such regulation should come in the form of a cap and trade. Programmatic measures will just not work for natural gas transmission and storage providers. They will almost certainly result in reduced natural gas availability and hinder programs to reduce fuel switching from high carbon fuels.

² Staff Report: Initial Statement of Reasons for Rulemaking Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (ASSEMBLY BILL 32)

³ In this vein, Wild Goose submits that it may also be appropriate to extend such exemption to natural gas supply production and processing.

For example, Wild Goose's GHG emissions are associated with the volume of natural gas burned at its storage facilities to operate natural gas compressor sets and the heaters in its natural gas processing unit. Thus, programmatic measures would likely come in the form of dictates on how many hours compressors may be run or what type of equipment can be used. In other words, the measures would need to be at the level of dictating to Wild Goose how to operate its business. While Wild Goose is a public utility subject to the Commission's jurisdiction, it is also a fully at-risk facility; it has no captive ratepayers or guaranteed cost recovery. Programmatic measures which impact operations and thereby decrease the amount of natural gas which Wild Goose can make available will undercut the profitability of Wild Goose's venture. Reducing or hampering the ability of storage providers such as Wild Goose to provide competitive services will ultimately put the natural gas storage sector into a repetitious pattern of raising prices to recover costs of facilities which now, due to imposed programmatic measures, are only able to serve a reduced customer base. The increased price of service drives customers away thus exacerbating the situation and causing the cycle to repeat. The end result of limiting the availability of natural gas in the state (with potential concomitant price increase for such natural gas) will increase (because of negative fuel switching and leakage), not reduce, the level of GHG emissions.

Wild Goose would caution, however, that if a cap and trade form of GHG regulation is imposed on natural gas infrastructure, then the cap cannot be based on historical performance. Rather it must be based on current production (or in the case of a natural gas storage provider such as Wild Goose, volume of service), adjusted annually. Failure to have a forward looking cap will hinder the expansion of independent facilities such as Wild Goose's storage project. The need to purchase credits in the market in order to accommodate enhanced infrastructure will, as a

necessity, increase the cost of providing service. Unlike the incumbent public utilities which can recover the cost of acquiring such credits from the rates charged their captive core customers, i.e., not having to increase the rates for their competitive services, independent storage providers do not have such luxury. The costs of acquiring emission allowance credits will directly factor into the rates which Wild Goose will need to charge its customers, placing it at a distinct competitive disadvantage. The Commission should not set in place a form of regulation which will deter the expansion of natural gas facilities (which as stated above are part of the solution to the problem of GHG emissions) by placing certain of those facilities at a competitive disadvantage.

III. POINT OF REGULATION (Question 10)

In its October 19, 2007 Report on Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions, the Staff of the Air Resources Board concluded that:

[T]he facilities required to annually report their GHG emissions include electricity generating facilities, electricity retail providers and power marketers, oil refineries, hydrogen plants, cement plants, cogeneration facilities, and industrial sources that emit over 25,000 metric tonnes per year of CO₂ from stationary source combustion. The latter category includes diverse facilities such as food processing, glass container manufacture, oil and gas production, and mineral processing.⁴

For reporting purposes, natural gas infrastructure would fall in the last category listed – industry sources that emit over 25,000 metric tonnes per year of CO₂ from stationary source combustion. Accordingly (as posed in question 10 of the November 28 Ruling), if the Air Resources Board chooses to individually regulate emissions from facilities in the natural gas sector, then it should

⁴ Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (Assembly Bill 32), California Air Resources Board Staff Report (October 19, 2007) (“CARB Staff October 19 Report”), Executive Summary, at pp. iii-iv.

use the same level of GHG emissions – i.e., 25,000 metric tonnes per year – as the threshold to define the large point sources to regulate. The rationale that the ARB used to select 25,000 metric tonnes per year threshold for reporting applies equally to compliance:

Using the list of statewide permitted facilities and their estimated CO₂ emissions for 2004, staff applied a potential reporting threshold of 10,000 metric tonnes (MT) of CO₂. This threshold would bring in over 300 facilities for mandatory reporting and raise the portion of the point source CO₂ inventory estimated from [the California Emission Inventory Development and Reporting System] CEIDARS that would be included in reporting to 96 percent, up from 72 percent with just sector specific reporting. When a 25,000 MT threshold was applied to the list of statewide permitted facilities, approximately half of the 300 facilities under the 10,000 MT threshold fell out, but the remaining facilities still allowed for inclusion of an additional 22 percent (and a total of about 94 percent) of the stationary CO₂ inventory estimated from CEIDARS. *Staff finds that the doubling of facilities subject to reporting under a 10,000 MT threshold, when only improving the inventory capture by 2 percent compared to a 25,000 MT threshold, is not a worthwhile extension of the reporting burden.*⁵

The same should hold true for determining the point of regulation. In determining whether to individually regulate emissions from certain sectors (as queried in Question 10 of the November 28 Ruling), the CPUC (and ultimately the ARB) must keep in mind that it is simply not cost beneficial to extend regulation to capture facilities which emit less than 25,000 metric tonnes of CO₂ per year if such would only improve inventory capture by two percent. Indeed, given that the totality of the emissions from natural gas sector end user combustion (including natural gas combustion during the transmission distribution and storage of gas) is only 13.87% of the state's total GHG emissions,⁶ the amount of inventory capture to be gained by extending regulation to facilities that produce less than 25,000 metric tonnes of CO₂ per year is approximately 0.28% percent.

Moreover, absent a reporting requirement, there is no means of ensuring compliance with

⁵ CARB October 19 Report, p. 53 (emphasis added).

the imposed regulation. If the required level of reporting is for sources emitting over 25,000 metric tonnes of CO₂, then the extent of the regulation must be at a comparable level. CPUC staff has determined the appropriateness of ceding the development of reporting protocols for GHG emission from the transportation, distribution and storage of natural gas to the ARB:

Staff proposes to rely on those [ARB] processes to be the primary vehicles for addressing reporting requirements for the natural gas sector. Thus this proceeding would not include a separate track for natural gas reporting and tracking.⁷

If the CPUC has determined that the appropriate level for reporting is for sources emitting over 25,000 tonnes of CO₂, then that of necessity should become the threshold it recommends to the ARB for regulation.

IV. OVERALL RECOMMENDATION (Questions 20-22)

Wild Goose recommends that natural gas infrastructure (transmission, distribution and storage) not be subjected to an enforceable cap for GHG emissions and neither should reductions through programmatic requirements be imposed. As noted in the CPUC Staff July 12 Report, the emission from natural gas combustion during the transmission, distribution and storage of gas account for less than 1/20 of 1 percent of the state's total GHG emissions.⁸ Natural gas infrastructure is not the problem that needs to be solved in the state's quest to reduce GHG. To the contrary, as stated above it is part of the solution. Natural gas is one of the least carbon intensive sources of fuel. Restricting the operation of the infrastructure (by placing a cap on its GHG emissions) does not serve to advance the state's goal.

Wild Goose is aware that this recommendation does not comport with that of the CPUC

⁶ See Preliminary Staff Recommendation for Treatment of Natural Gas Sector Greenhouse Gas Emissions, R. 06-04-009 (July 12, 2007) ("CPUC Staff July 12 Report") at p. 7

⁷ CPUC Staff July 12 Report, at p. 17.

⁸ CPUC Staff July 12 Report, at p.7.

Staff in its July 12 Report, which concludes that the “the scope of emissions regulation should include both emission from end users and emissions from natural gas infrastructure.”⁹

Specifically, Staff suggests that:

Infrastructure emissions associated with the transmission, distribution and storage of natural gas for all end uses should be the responsibility of infrastructure providers and should be regulated within the natural gas sector cap. This includes investor owned utilities, publicly owned utilities, independent storage providers and interstate pipelines for their operations in California.¹⁰

In assessing the Staff’s recommendation, the CPUC should bear in mind its ultimate impact on GHG reduction. In brief, the imposition of a cap implies the setting of an initial level followed by a ratcheting down as steps are taken to reduce GHG emissions. The question then becomes how are natural gas infrastructure facilities suppose to reduce emissions. If fugitive emissions are already at or near zero, then the only source of potential reduction is to reduce the fuel burned at the facility – an accomplishment which can only be met by reducing the amount of gas transported and/or stored.¹¹ The resulting reduction in the availability of natural gas will necessitate that consumers switch to more carbon intensive fuels and result in leakage to other nearby jurisdictions. The amount of GHG emissions eliminated by capping those of natural gas infrastructure facilities will be dwarfed by the increase in emissions due to fuel switching and leakage.

V. CONCLUSION

Wild Goose appreciates this opportunity to offer these comments on issues related to the type and point of regulation of GHG emissions for the natural gas sector. Wild Goose would simply

⁹ CPUC Staff July 12 Report, at p.15.

¹⁰ CPUC Staff July 12 Report, at p. 16.

¹¹ There is also the possibility of converting the facilities pumping units to electric motors, but the carbon required to produce the electricity is greater than the carbon burned in the gas burning engines.

request that the CPUC, in formulating its proposed recommendation to the Air Resources Board on such issues factor into its deliberations the beneficial impact of natural gas use on the overall level of GHG, as discussed above.

Respectfully submitted,

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By /s/ Jeanne B. Armstrong
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December 17, 2007

CERTIFICATE OF SERVICE

I, Melinda LaJaunie, certify that I have on this 17th day of December 2007 caused a copy of the foregoing

COMMENTS OF WILD GOOSE STORAGE, LLC ON TYPE AND POINT OF REGULATION ISSUES

to be served on all known parties to R.06-04-009 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17th day of December 2007 at San Francisco, California.

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